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January 18, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte*
Petitions for Waiver of the Commission's Rules for Modifying Access Rate
Bands and Charges and 2011 Base Period Revenue
Telapex, Inc., WC Docket No. 17-252
Venture Communications Cooperative, WC Docket No. 17-323

Dear Ms. Dortch:

On January 16, 2018, the undersigned and Brian Sullivan of JSI met with Pamela Arluk, Lynne Engledow, Doug Slotten, and Lisa Hone of the Federal Communications Commission ("Commission") Wireline Competition Bureau ("Bureau"). Amy Goodman of the Bureau and Jon Boike of JSI also joined the meeting via telephone. The subjects of discussion were the above-referenced Telapex, Inc. ("Telapex") and Venture Communications Cooperative ("Venture") petitions for waiver ("Petitions").

JSI representatives discussed the circumstances of the Telapex Petition, specifically, that Delta Telephone Company ("Delta") was merged into Franklin Telephone Company ("Franklin") with Franklin being the surviving entity effective January 1, 2018. The study areas for these wholly-owned subsidiaries were also merged effective January 1, 2018, pursuant to FCC precedent.¹ Both Delta and Franklin are recipients of ACAM support, and one of the primary purposes of the merger was to maximize corporate efficiencies in the regulatory and compliance area, such as cost studies, tariffs, and broadband and special access pricing.

JSI representatives also discussed the circumstances of the Venture Petition, and explained that Western Telephone Company was acquired by Venture as a wholly-owned subsidiary corporation in July 2008, and was subsequently merged into the surviving Venture entity in January 2015. The separate Venture fka Western and Venture study areas were retained at

¹ See Notice of Consolidation of Commonly-Owned Study Areas, Telapex, Inc., Holding Company for Delta Telephone Co., Inc. 280452 and Franklin Telephone Co., Inc. 280454 in Mississippi, CC Docket No. 96-45 (Aug. 4, 2017).

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the time of the 2015 merger. However, effective January 1, 2018, these study areas were merged pursuant to FCC precedent.²

JSI discussed the need for expedited treatment of the Telapex and Venture petitions to permit the carriers to fully implement the study area consolidations.

Please contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Kuykendall".

John Kuykendall
Vice President

cc: Pamela Arluk
Lynne Engledow
Doug Slotten
Lisa Hone
Amy Goodman

² See Notice of Consolidation of Commonly-Owned Study Areas, Venture Communications Cooperative, South Dakota Study Areas 391680 and 391688, CC Docket No. 96-45 (Nov. 13, 2017).